

March 20, 2018

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: State E-Rate Coordinators Alliance March 19, 2018 *Ex Parte* Submission in Response to Notification of Ex Parte Presentation by the Ohio Information Technology Centers dated March 16, 2018

*WC Docket No. 13-184*  
*CC Docket No. 02-6*

Dear Secretary Dortch:

Kellogg & Sovereign<sup>®</sup> Consulting, LLC submits this letter in support of the letter filed on March 19, 2018 by the State E-Rate Coordinators Alliance (“SECA”).

**We strongly agree with SECA’s recommendation that the 2018 filing window NOT be extended. Extending the filing window is not a solution to the “Form 470 drop down issue.”**

SECA’s letter was in response to the March 16, 2018 notice of Ex Parte filed by the Ohio Information Technology Centers (“OITC”) regarding its presentation to the Commission on March 14, 2018 concerning the August 22, 2018 changes announced by USAC for the manner in which E-Rate applicants are required to select certain Form 470 drop-down menu options in order to meet E-rate competitive bidding requirements.

Kellogg & Sovereign agrees that there is a great deal of confusion when using USAC dropdown tables. Correctly filing requests on the FCC Form 470 is not a new problem, but it has been compounded with the need from a systems side to organize a wide range of incoming data related to services requested and present this same information to service providers in an organized manner for a fair and open competitive bidding process.

USAC needs to have the flexibility to improve the online program, but applicants also need to be able to do their best efforts and not be unfairly penalized for “form over function.” We recommend that the program support the following guidance from The USAC March 18, 2016 News Brief<sup>1</sup> which provided the following instructions for applicants who did their best at selecting from the drop downs:

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<sup>1</sup> <https://www.usac.org/si/tools/news-briefs/preview.aspx?id=672>

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**Q. I have already filed my FCC Form 470. Based on the information above, I believe that I chose the wrong dropdown. What should I do?**

A. Although the correct choice is important, as long as you have provided sufficient information to enable service providers to submit responsive bids, you can point to that information if you get any questions during the review of your application. You can provide this information in one of the following ways:

- In the FCC Form 470 narrative.
- If you indicated that you had an RFP, in the RFP document you uploaded prior to certifying your form.
- If you uploaded an RFP document before certification, in an RFP document that was subsequently uploaded to your form prior to the Allowable Contract Date (the date 28 days after your FCC Form 470 was certified).

If you indicated on your FCC Form 470 that you had an RFP, and you want to attach another RFP document to your form after the form has been certified:

- Go to your landing page.
- Search for your certified FCC Form 470 in the "FCC Forms" section.
- Click the nickname of your form, then choose "Related Actions" from the left-hand menu.
- Choose "Add an RFP Document" and follow the instructions provided to upload your document.

Remember, however, that you cannot attach an RFP document to an FCC Form 470 unless at least one RFP document was attached to the form at the time it was certified.

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Respectfully submitted,

/s/ Deborah Jane Sovereign

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